

STATE OF MICHIGAN  
IN THE FEDERAL DISTRICT COURT FOR  
THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

JAMES STEWART AS NEXT )  
FRIEND OF MORRAH STEWART, )  
Plaintiff, ) CASE NO. 21:  
 ) HON.:  
 ) MAG:  
-VS.- )  
 )  
MANCHESTER COMMUNITY )  
SCHOOLS, MANCHESTER JUNIOR )  
SENIOR HIGH )  
SCHOOL, MANCHESTER )  
COMMUNITY SCHOOLS )  
BOARD OF EDUCATION, )  
DR. BRADLEY )  
BEZEAU in his Individual )  
capacity and in his official capacity as )  
Superintendent of MANCHESTER )  
COMMUNITY SCHOOLS )  
DISTRICT, AND DOES 1 through )  
100, )  
Defendants. )

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MUSSIN & SCANLAND, PLLC  
SCOTT P. MUSSIN (P66748)  
By: JERARD M. SCANLAND (P74992)  
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**PETITION FOR APPOINTMENT OF  
NEXT FRIEND TO THIS HONORABLE COURT**

TO THE CLERK OF THIS HONORABLE COURT:

Your Petitioner, **JAMES STEWART**, Father of MS, by and through Plaintiff's attorneys, MUSSIN & SCANLAND, PLLC, respectfully represents unto this Honorable Court:

1. That MS is under the age of eighteen (18) years, to-wit, 17 years old.
2. That heretofore, to-wit, on or about March 1, 2020, MS sustained injuries as a result of the Defendants' actions, for which Defendants are responsible for damages to MS.
3. That JAMES STEWART has been advised by counsel that his daughter, MS, has a right of action and is entitled to maintain a suit thereon for damages against the Defendants herein.
4. That he is the father of MS and that MS, being a minor under the age of eighteen (18) years, is incapable of petitioning this Court on her own behalf and for whom no general guardian has been appointed.

**WHEREFORE**, your Petitioner prays that he may be appointed as Next of Friend for MS for the purpose of appearing in said action as her Next Friend and becoming security for costs.

/s/ James Stewart

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**JAMES STEWART**

STATE OF MICHIGAN )  
                          ) SS  
COUNTY OF WAYNE    )

James Stewart , being duly sworn, deposes and says that he has read the foregoing petition and knows the contents thereof and that the same is true of his own knowledge except as to those matters therein stated to be on information and belief and as to those matters, believe them to be true.

/s/ James Stewart

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**JAMES STEWART**

Dated: October 11, 2021

Respectfully submitted,

**MUSSIN & SCANLAND, PLLC,**

BY: /s/ Jerard M. Scanland  
**JERARD M. SCANLAND (P74992)**  
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**ORDER FOR APPOINTMENT OF NEXT FRIEND**

At a session of said court held in the City of Detroit, Wayne County, State of Michigan on \_\_\_\_\_.

Present Hon: \_\_\_\_\_  
**District Court Judge**

On reading and filing of the Petition of JAMES STEWART, father of minor daughter, MS, by and through counsel Mussin & Scanland, PLLC, for his appointment as Next of Friend, in the within lawsuit, as Next of Friend to Minor MS, against the Defendants' herein, the Court being fully apprised therein;

**IT IS HEREBY ORDERED** that JAMES STEWART, as mother of minor daughter, MS, be and is hereby appointed Next Friend of Minor daughter, MS, in and about their cause of action and the maintenance of her suit thereon against the Defendants herein.

Dated:

\_\_\_\_\_  
**District Court Judge**